

GLOBAL TRADE, IMPORT/EXPORT POLICY

POLICY STATEMENT

We are committed to complying with all applicable customs, trade, and import/export laws and regulations that govern the movement of our products across international borders. This includes providing accurate and truthful information to authorities about the products we import and export.

WHAT TO DO

COMPLY with applicable import/export laws and regulations by using accurate data about classifications, valuations, country of origin, and other applicable customs entry data.

COMPLY with all legally applicable trade or import/export sanctions or restrictions.

MONITOR FOR DENIED PARTIES and stop transactions that involve denied parties.

CONDUCT post entry reviews of customs data to ensure accuracy and validity of entries submitted.

SUPERVISE AND AUDIT CUSTOMS BROKERS and other third parties who interact with customs or import/export authorities on behalf of the company.

MAINTAIN complete, accurate, and sufficiently detailed information regarding all export/import activity.

COMPLY with export authorizations of controlled items, where applicable, and any end-use and end-user controls.

WHAT TO LOOK FOR

HANDCARRYING of commercial goods across borders by company associates.

PORT DELAYS that are excessive in both time and nature.

REQUESTS FROM CUSTOMS BROKERS or other service providers to speed up or facilitate the import/export process.

ANY UNSUPPORTED, GENERIC, OR "OTHER" FEES charged by Customs Brokers or other service providers.

PAYMENTS TO GOVERNMENT OFFICIALS (e.g., customs officers), or payments to companies related to government officials.

RECURRING OR EXCESSIVE FINES and penalties by government agencies.

MISREPRESENTATION of information or data to government officials to affect "release" and/or lower our duty/tax liability.

EXPORTS to a freight forwarders address, or where the customer is vague about the end-use or end-user of the product.

Asking Questions and Reporting Violations

To ask a question about this policy or to report a suspected violation of this policy, please contact a member of Management, the Compliance department, or the Legal department.

You may also report suspected violations by contacting Walmart's Global Ethics Helpline:

1-800-963-8442

Web: www.walmartethics.com or Email: ethics@wal-mart.com

Reports to the Ethics Helpline are always confidential, and if you choose, you may report your concern anonymously.

Additional specific country contact information can also be found on www.walmartethics.com.

In the U.S., you may also use the U.S. Compliance Hotline for questions: 1-800-530-9923

Related Policies: Statement of Ethics

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